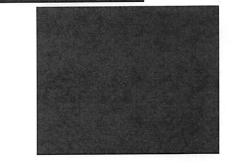
UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA ORLANDO DIVISION



UNITED STATES OF AMERICA

v.

CASE NO. 6:20-cr-89-ORL-37LRH

18 U.S.C. § 115

JAMES LAPIN

18 U.S.C. § 875

INDICTMENT

The Grand Jury charges:

COUNT ONE

On or about December 20, 2019, in the Middle District of Florida, and elsewhere, the defendant,

JAMES LAPIN,

did knowingly threaten to assault and murder an elected Representative of the United States House of Representatives (referred to herein as the "Member of Congress"), with intent to intimidate the Member of Congress while the Member of Congress was engaged in the performance of that Member's official duties and with intent to retaliate against the Member of Congress on account of the performance of that Member's official duties.

In violation of 18 U.S.C. § 115(a)(1)(B).

COUNT TWO

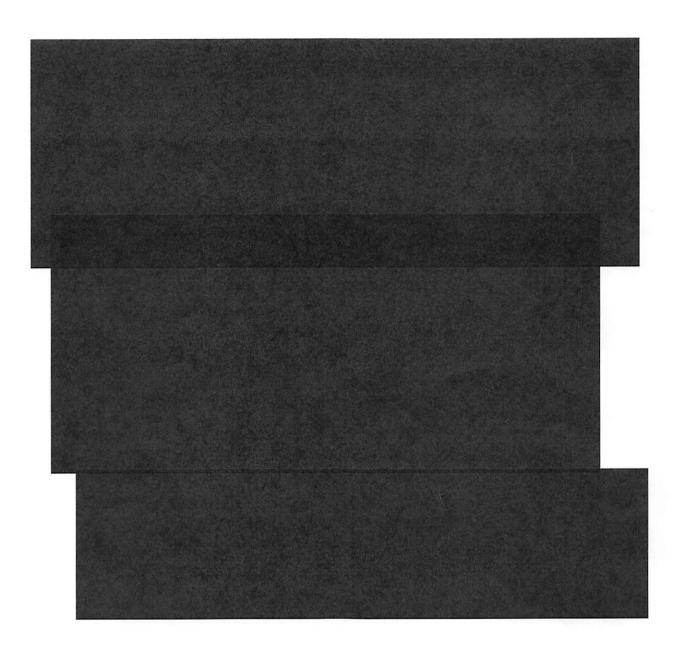
On or about December 20, 2019, in the Middle District of Florida, and elsewhere, the defendant,

JAMES LAPIN,

did knowingly and for the purpose of issuing a threat and with knowledge that the communication would be viewed as a threat, transmit in interstate commerce from the State of Florida to the District of Columbia, a communication to the District of Columbia Office of an elected Representative of the United States House of Representatives (referred to herein as the "Member of Congress"), and the communication contained a threat to injure the Member of Congress, specifically indicating that the Member of Congress needed to wear a "bullet proof [vest]" and that Member of Congress would be "dead."

In violation of 18 U.S.C. § 875(c).







MARIA CHAPA LOPEZ United States Attorney

By:

Sean P. Shecter

Assistant United States Attorney

By:

Roger B. Handberg
Assistant United States Attorney

Chief, Orlando Division